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PROPOSED ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

IMAGENATION OF ALLEN, LLC,

Debtor.

§
§
§
§
§

**CASE NO. 23-40444
Chapter 11**

**MOTION TO VOLUNTARILY DISMISS DEBTOR'S
CHAPTER 11 BANKRUPTCY CASE**

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT, 660 N. CENTRAL EXPRESSWAY, SUITE 300B, PLANO, TEXAS 75074 AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Imagination of Allen, LLC, the Debtor in the above-styled and numbered bankruptcy case ("Debtor"), by its attorney, hereby requests that its Chapter 11 Bankruptcy Case be dismissed.

1. Debtor filed for Chapter 11 Bankruptcy on March 9, 2023.

2. On March 17, 2023, this Court entered its *Agreed Order Granting VAA Improvements, LLC's Emergency Motion for Relief from the Automatic Stay as it Relates to Debtor's Leased Premises* [Docket No. 26]. Pursuant to the terms of the Order, the Debtor was deemed to have surrendered the leased premises to the landlord on March 17, 2023.

3. Debtor therefore does not wish to continue with this bankruptcy case at this time.

WHEREFORE, PREMISES CONSIDERED, Debtor prays for an order from the Court dismissing Debtor's Chapter 11 Bankruptcy Case proceeding and for such other and further relief to which it may show itself justly entitled.

DATED: March 23, 2023.

Respectfully Submitted,

/s/ Joyce W. Lindauer

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 23, 2023, a true and correct copy of the foregoing document was served via United States first class mail, postage prepaid, upon the parties on the attached service list.

/s/ Joyce W. Lindauer

Joyce W. Lindauer

Label Matrix for local noticing
0540-4
Case 23-40444
Eastern District of Texas
Sherman
Thu Mar 23 12:06:53 CDT 2023

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Document Page 5 of 5

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

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Rev Acctg Div/Bankruptcy Dept
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Austin, TX 78711

JPMorgan Chase Bank, NA
Collateral Mgmt Small Business
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Louisville, KY 40232-9891

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

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(u)VAA Improvements, LLC

End of Label Matrix
Mailable recipients 62
Bypassed recipients 7
Total 69